EXHIBIT B

From: Kate Swift < kate.swift@bartlit-beck.com > Sent: Thursday, September 13, 2018 5:12 PM

To: Jeff Gaddy < jgaddy@levinlaw.com>

Cc: Peter Mougey <<u>pmougey@levinlaw.com</u>>; Laura Dunning <<u>ldunning@levinlaw.com</u>>; Page Poerschke <<u>ppoerschke@levinlaw.com</u>>; Becca Timmons <<u>btimmons@levinlaw.com</u>>; Salvatore C. Badala <SBadala@NapoliLaw.com>; Hunter Shkolnik <Hunter@NapoliLaw.com>; Joseph L. Ciaccio

<a href="mailto:subst

<kaspar.stoffelmayr@bartlit-beck.com>; opioids@golkow.com

Subject: RE: Notice of Deposition - Walgreens

Counsel,

We do not agree to offer Mr. Bratton for his deposition on September 27.

Walgreens offers the following deposition dates for each of the witnesses you requested in your August 31 initial list of witnesses:

- Sean Barnes October 23
- Steve Mills November 8
- Patty Daugherty November 15
- Ed Bratton November 30
- Barb Martin December 19

We expect that several of these witnesses will be designated on one or more 30(b)(6) topics. We will designate witnesses for specific topics shortly, in accordance with the Court's orders.

Walgreens will present each of these witnesses at Bartlit Beck's Chicago office.

Have a good night, Kate

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From: Jeff Gaddy < <u>igaddy@levinlaw.com</u>> Sent: Friday, September 7, 2018 1:11 PM

To: Hobart, Geoffrey <ghobart@cov.com>; Mainigi, Enu <<u>EMainigi@wc.com</u>>; McClure, Shannon E. <<u>SMcClure@ReedSmith.com</u>>; <u>mark.cheffo@dechert.com</u>; Carole S. Rendon (<u>crendon@bakerlaw.com</u>) <<u>crendon@bakerlaw.com</u>>; Kaspar Stoffelmayr <<u>kaspar.stoffelmayr@bartlit-beck.com</u>>; Kate Swift <<u>kate.swift@bartlit-beck.com</u>>; <u>ttarney@grsm.com</u>

Cc: Peter Mougey <<u>pmougey@levinlaw.com</u>>; Laura Dunning <<u>ldunning@levinlaw.com</u>>; Page Poerschke <<u>ppoerschke@levinlaw.com</u>>; Becca Timmons <<u>btimmons@levinlaw.com</u>>; Salvatore C.

Badala <<u>SBadala@NapoliLaw.com</u>>; Hunter Shkolnik <<u>Hunter@NapoliLaw.com</u>>; Joseph L. Ciaccio <<u>JCiaccio@NapoliLaw.com</u>>; Andrew Dressel <<u>ADressel@NapoliLaw.com</u>>; Katie Mayo <<u>kmayo@levinlaw.com</u>>; <u>mdl2804discovery@motleyrice.com;opioids@golkow.com</u> **Subject:** Notice of Deposition - Walgreens

Counsel,

Attached please find the notice of deposition for Edward Bratton.

Jeff Gaddy

Attorney
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Rafferty & Proctor, P.A.
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